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*Attorneys for the Plaintiffs and the  
Proposed Class Members*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ANDREW CLARKE and TAPAS SARKAR,  
individually and on behalf of other similarly  
situated persons,

Plaintiffs,

v.

J.P. MORGAN CHASE & CO.,

Defendant.

**08 Civ. 2400 (CM) (JCF)**

**NOTICE OF MOTION FOR  
CONSOLIDATION AND THE  
APPOINTMENT OF OUTTEN &  
GOLDEN, LIEFF CABRASER, AND  
ALTSHULER BERZON AS CO-LEAD  
INTERIM CLASS COUNSEL  
PURSUANT TO FEDERAL RULES OF  
CIVIL PROCEDURE 23(G) AND 42(A)**

PLEASE TAKE NOTICE that, Plaintiffs will move this Court, before the Honorable Colleen McMahon, United States Courthouse, 500 Pearl St., Room 640, New York, New York 10007, on a date and time to be determined by the Court, for an Order of Consolidation and Appointment of Outten & Golden, LLP, Lieff Cabraser Heimann & Bernstein, LLP, and Altshuler Berzon, LLP as Co-Lead Interim Class Counsel Pursuant to Federal Rules of Civil Procedure 23(g) and 42(a).

In support of this Motion, Plaintiffs submit the following:

- (1) Declaration of Jack A. Raisner, Esq.;
- (2) Declaration of Adam T. Klein, Esq.;
- (3) Declaration of Rachel Geman, Esq. and attached Exhibit A (firm resume);
- (4) Declaration of Eve H. Cervantez, Esq.;
- (5) Memorandum of Law in Support of Plaintiffs' Motion for Consolidation and the Appointment of Outten & Golden, Lieff Cabraser, and Altshuler Berzon as Co-Lead Interim Class Counsel Pursuant to Federal Rules of Civil Procedure 23(g) and 42(a).

Plaintiffs also submit to this Court a Proposed Order for Consolidation and the Appointment of Outten & Golden, Lieff Cabraser, and Altshuler Berzon as Co-Lead Interim Class Counsel Pursuant to Federal Rules of Civil Procedure 23(g) and 42(a).

Dated: New York, New York  
April 29, 2008

Respectfully submitted,

/s/ Adam T. Klein (AK 3293)  
Adam T. Klein

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